



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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PMSP / IEB

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

DEC 1 1986

MEMORANDUM

SUBJECT: PP#6E3389 (RCB No. 1439). Chlorpyrifos on Leeks.
Amendment Dated August 19, 1986. Record #180526.

FROM: Nancy Dodd, Chemist *Nancy Dodd*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: Charles L. Trichilo, Ph.D., Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Hoyt Jamerson, PM #43
Registration Support and Emergency Response Branch
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

The petitioner, IR-4, has now submitted an amendment to PP#6E3389. This amendment consists of a letter dated August 19, 1986 and revised Sections B and F. This amendment is submitted in response to deficiencies listed in RCB's review of PP#6E3389 dated July 7, 1986 (N. Dodd).

The deficiencies listed in the July 7, 1986 review are outlined below, followed by the petitioner's responses, and RCB's discussions/conclusions.

RCB's Deficiency No. 1

At present, some plant metabolism data gaps need to be resolved (see RCB's memorandum of July 15, 1985 re: EPA Registration No. 464-523). However, if no detectable residues (i.e., residues above the sensitivity of the analytical

methodology) are found in leeks as a result of this proposed use (see Residue Data section), RCB could conclude that the nature of the residue in leeks is adequately understood for the purpose of this petition only. The residues of concern would be chlorpyrifos and its metabolite 3,5,6-trichloro-2-pyridinol (TCP).

Petitioner's Response to Deficiency No. 1

The petitioner indicates that no detectable residues were found in leeks from the recommended use pattern. (The petitioner submits a revised petition page 30 which deletes the 1.4 ppm TCP entry, which the petitioner indicates does not relate to the recommended use. The petitioner indicates that residues in the recommended use pattern samples were all < 0.2 ppm TCP.)

RCB's Conclusion No. 1

RCB feels that a full explanation of what use pattern the 1.4 ppm TCP value represents should have been given by the petitioner because this would eliminate the impression that some information is being withheld. However, since the submitted proposed use is supported by the residue data at hand, RCB will conclude that the nature of the residue in leeks is adequately understood for the purpose of this petition only. Deficiency No. 1 is resolved.

RCB's Deficiency No. 4a

On page 30 (Minor Use Residue Form) of Accession Number 262136, the New Jersey residue range found is stated to be < 0.2 to 1.4 ppm for TCP on "whole leek" although elsewhere residues of TCP are stated to be < 0.2 ppm. The petitioner should provide an explanation.

Petitioner's Response to Deficiency No. 4a

The petitioner submits a revised petition page 30 which deletes the 1.4 ppm TCP entry, which the petitioner indicates does not relate to the recommended use. The petitioner indicates that residues in the recommended use pattern samples were all < 0.2 ppm TCP.

RCB's Conclusion No. 4a

Because of reasons given in RCB's Conclusion No. 1 above, RCB will conclude that Deficiency No. 4a is resolved.

RCB's Deficiency No. 4b

Since residue data on leeks are submitted for only California (CA) and New Jersey (NJ), a tolerance with regional registration should be proposed or additional residue data for other geographic areas are needed.

Petitioner's Response to Deficiency No. 4b

The petitioner submits revised Sections B and F which restrict use to NJ only.

RCB's Conclusion No. 4b

Deficiency No. 4b is resolved since the petitioner has restricted his proposed use to NJ only.

RCB's Deficiency No. 4c

Plants are not to be trimmed before analysis. In CA (see p. 49 of Accession Number 262136 - Minor Use Residue Form), field processing included peeling off of outer skins and removal of extreme tips. Therefore, additional residue data on the untrimmed raw agricultural commodity are needed to support the proposed use in CA, or use could be restricted to NJ.

Petitioner's Response to Deficiency No. 4c

The petitioner submits revised Sections B and F which restrict use to NJ only.

RCB's Conclusion No. 4c

Deficiency No. 4c is now resolved because of the submission of revised Sections B and F.

RCB's Deficiency No. 4d

The Section B/label should be revised to indicate application in a minimum of 70 gallons of total drench per acre; this is reflective of the residue data submitted. As an alternative, the petitioner may submit additional residue data using a spray volume of 40 gallons (see Residue Data section).

Petitioner's Response to Deficiency No. 4d

No response.

RCB's Conclusion No. 4d

Deficiency No. 4d is not resolved. The petitioner must address the issue raised in Deficiency No. 4d above.

RCB'S Deficiency No. 4e

RCB reserves its conclusion concerning the adequacy of the proposed 0.5 ppm chlorpyrifos tolerance on leeks until Conclusions 1, 4a, 4b, 4c, and 4d above are resolved.

Petitioner's Response to Deficiency No. 4e

The petitioner has addressed items 1, 4a, 4b, and 4c.

RCB's Conclusion No. 4e

Deficiencies 4d and 4e have not been resolved.

RCB reserves its conclusion concerning the adequacy of the proposed 0.5 ppm chlorpyrifos tolerance on leeks until Conclusions 4d and 4e are resolved.

Other Considerations

An International Residue Limits (IRL) Status sheet was attached to the review of PP#6E3389 dated July 7, 1986 (N. Dodd). There are no Codex, Canadian, or Mexican tolerances for chlorpyrifos on leeks. Therefore, no compatibility questions exist with respect to Codex.

Recommendation

Provided that the petitioner adequately addresses Deficiencies 4d and 4e above, RCB will recommend for the proposed use of chlorpyrifos on leeks.

The petitioner should be informed about RCB's Conclusion No. 1 in this review.

Since the proposed use is restricted to leeks grown in NJ only, any future tolerance for chlorpyrifos on leeks should be included in a separate subsection under 40 CFR 180.342 to avoid confusion regarding future 24(c) registrations and crop-grouping eligibility. The "tolerances with regional registration" would be referenced along with future regional registration tolerances in a new subsection (n) under 40 CFR 180.1 which would define the Agency's

4

interpretation of "tolerances with regional registration." An appropriate interpretation for 40 CFR 180.1, subsection "n", would be:

Certain tolerances are based on geographically limited residue data. These "tolerances with regional registration" are included in separate subsections under 40 CFR 180.101 through 180.999. In order to expand the area of usage on these crops, additional residue data generated in these areas will be required. Persons seeking geographically broader registration on these crops should contact the appropriate EPA product manager concerning whether additional residue data are required.

cc: RF, Circu, Reviewer-N.Dodd, EEB, EAB, TOX, PM #43,
PP#6E3389, FDA, PMSD/ISB-Eldredge
RDI: J.H. Onley: 11/19/86: R.D. Schmitt: 11/19/86
TS-769:RCB:CM#2:RM 810:X1681:N.Dodd:Kendrick &Co.: 11/21/86